

# United States District Court

for the  
Western District of New York

United States of America

v.

Case No. 24-MJ-1065

GINO PEACE SALTER

*Defendant*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

### COUNT 1

#### **(Engaging in the Firearms Business Without a License)**

Between on or about June 1, 2023, and on or about December 31, 2023, in the Western District of New York, and elsewhere, the defendant, GINO PEACE SALTER, not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

### COUNT 2

#### **(Interstate Shipment and Transportation of Firearms)**

Beginning in or about July 1, 2023, the exact date being unknown, and continuing until in or about August 9, 2023, in the Western District of New York and elsewhere, the defendant, GINO PEACE SALTER, with the intent to commit offenses therewith punishable by imprisonment for a term exceeding one year, and with knowledge and reasonable cause to believe that offenses punishable by imprisonment for a term exceeding one year were to be committed therewith, that is, violations of New York Penal Law Section 265.01-b, did ship and transport, and aid and abet the shipment and transportation of, firearms in interstate commerce, that is, from the State of Pennsylvania to the State of New York, in violation of Title 18, United States Code, Sections 924(b) and 2.

This Criminal Complaint is based on these facts:

☒ Continued on the attached sheet

JOHN

NOWAK

*Complainant's signature*

JOHN NOWAK

Special Agent

Bureau of Alcohol, Firearms, Explosives, and Tobacco

*Printed name and title*

*John J. McCarthy*

*Judge's signature*

HONORABLE JEREMIAH J. MCCARTHY  
UNITED STATES MAGISTRATE JUDGE

*Printed name and title*

Sworn to and signed telephonically.

Date: March 12, 2024.

City and State: Buffalo, New York

Digitally signed by

JOHN NOWAK

Date: 2024.03.11

13:36:57 -04'00'

**AFFIDAVIT**

STATE OF NEW YORK     )  
COUNTY OF ERIE         )     SS:  
CITY OF BUFFALO         )

**JOHN J. NOWAK**, Special Agent of The Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), United States Department of Justice, having been duly sworn, states as follows:

**AGENT BACKGROUND**

1. I am a Special Agent with ATF and as such I am an “investigative or law enforcement officer” of the United States within the meaning of Section 2510(7) of Title 18, United States Code, that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code, Section 2516(1), et seq. and Title 21, United States Code, Section 801. I further state that I am the kind of Special Agent as delineated in Title 18 United States Code, Section 3051.

2. I have been an ATF Special Agent since January of 2021. I am assigned to the Buffalo Field Office, New York Field Division. I am a graduate of the ATF National Academy and the Criminal Investigator Training Program located at the Federal Law Enforcement Training Center in Glynco, Georgia. My primary duties as an ATF Special Agent include investigating violations of federal firearms laws including illegal firearms trafficking, unlawful possession of firearms, and the possession of firearms during the commission of drug trafficking crimes and crimes of violence.

3. During my time as an ATF Special Agent, I have participated in investigations, including the execution of search warrants and arrest warrants where illegally purchased/trafficked firearms, narcotics, electronic scales, packaging materials, cutting agents, books/ledgers indicating sales, receipts, computers, cellular telephones, and other items used to facilitate firearms and narcotics trafficking were seized. I have personally conducted and/or assisted in investigations of criminal acts involving violations relating to armed individuals that were involved in the distribution of controlled substances, including heroin, cocaine, methamphetamine, and other substances, in violation of federal drug laws, including Title 21, United States Code, Sections 841 and 846, and Title 18, United States Code, Sections 922 and 924. Additionally, I have participated in interviews and debriefings of individuals involved in firearms and narcotics trafficking. I am familiar with the habits, methods, routines, practices, and procedures commonly employed by persons engaged in the illegal trafficking of firearms and narcotics.

4. I make this affidavit in support of an application for a Criminal Complaint charging GINO SALTER with violations of Title 18, United States Code, Sections 922(a)(1)(A) (unlicensed dealing) and 924(b) (interstate shipment and transportation of firearms). I am thoroughly familiar with the information set forth in this affidavit because of my personal investigation, discussions with other law enforcement officers or statements provided by other law enforcement personnel, which have been reported to me, and examination of various documents and records in this investigation. Based upon that information, I assert that the articulated facts establish grounds for the issuance of a Criminal Complaint for GINO PEACE SALTER. This affidavit is intended to show simply that there is sufficient probable cause for the requested Criminal Complaint and does not set forth all of my

knowledge about this matter. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

### **RELEVANT STATUTES**

5. I have been informed by the United States Attorney's Office, Western District of New York, that:

- a) Title 18, United States Code section 922(a)(1)(A), provides that it shall be unlawful for any person:
  - I. Except a licensed importer, licensed manufacturer, or licensed dealer, to engage in the business of importing, manufacturing, or dealing in firearms, or in the course of such business to ship, transport, or receive any firearm in interstate or foreign commerce.
- b) The elements are:
  - I. The defendant was not licensed to deal firearms; and
  - II. The defendant willfully engaged in the business of dealing firearms.

To prosecute an unlicensed individual for unlawfully dealing in firearms under 18 U.S.C. § 922(a)(1)(A), the government must prove, among other things, that the person who engaged in such activity had an economic objective and “pursue[d] this objective through the repetitive purchase and resale of firearms.” Unites States v. Tyson, 653 F.3d 192, 200-01 (3d Cir. 2011). The Second Circuit in United States v. Nadirashvili, 655 F.3d 114, 119 (2d Cir. 2011):

We have held that: [t]he government need not prove that dealing in firearms was the defendant's primary business. Nor is there a ‘magic number’ of sales that need be specifically proven. Rather, the statute reaches those who hole themselves out as a source of firearms. Consequently, the government need only

prove that the defendant has guns on hand or is ready and able to procure them for the purpose of selling them from [time] to time to such persons as might be accepted as customers. *United States v. Carter*, 801 F.2d 78, 81-82 (2d Cir. 1986) (internal quotation marks and citations omitted).

Courts have consistently held that selling as few as two or four firearms is sufficient to sustain a conviction under Section 922(a)(1)(A). See, e.g. *United States v. Shan*, 361 Fed. Appx. 182, 183-84 (2d Cir. 2010) (unpub.) (sufficient evidence defendant was “engaged in the business” of firearms dealing where he “sold two firearms within roughly one month,” acknowledged...he had a source of supply for other weapons,” and “acted willfully” by being “wary to let others witness his transactions” and by selling “weapons for above market price”); *United States v. Pineda*, 411 Fed. Appx. 612, 614 (4th Cir. 2011) (unpub.) (sufficient evidence to sustain conviction under Section 922(a)(1)(A) where defendant sold four firearms without a license).

a) Title 18, United States Code section 924(b), provides:

- I. Whoever, with intent to commit therewith an offense punishable by imprisonment for a term exceeding one year, or with knowledge or reasonable cause to believe that an offense punishable by imprisonment for a term exceeding one year is to be committed therewith, ships, transports, or receives a firearm or any ammunition in interstate commerce shall be [guilty of a crime].

b) The elements of 924(b) are:

- I. First, that the defendant transported or shipped a firearm in interstate commerce; and
- II. Second, that the defendant transported and shipped the firearm with the intent to commit the crime or with knowledge that the crime would be committed or with reasonable cause to believe that the crime be committed with the firearm.

See 2 modern Federal Jury Instructions – Criminal P 35.13, Instruction 35-82 (2022); see also United States v. Tyson, 653 F.3d 192 (3d Cir. 2011).<sup>1</sup>

### **PROBABLE CAUSE**

6. Since July 2023, ATF, along with the Buffalo Police Department (BPD) Intelligence Unit has been investigating the firearms trafficking activities of GINO SALTER. SALTER has been known to post photos of suspected firearms to social media (including Facebook) on numerous occasions (depicted below). ATF subsequently received information that SALTER would post photos of firearms that he had available for sale on his Facebook page under username: “Kevin GMB.” This information was confirmed via analysis of SALTER’s communications on Facebook messenger and through the controlled purchase of a firearm that was depicted on SALTER’s Facebook account page.

7. As part of the investigation, in July 2023, in the Buffalo, NY, area, ATF conducted a controlled purchase of a firearm from SALTER that was audio and video recorded. Prior to the controlled purchase, law enforcement personnel established surveillance at the residential area the controlled purchase was being conducted. Law enforcement personnel observed a 2020 Kia Soul arrive on scene with SALTER driving. Law enforcement

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<sup>1</sup> New York Penal Law Section 265.01-b, in pertinent part, provides: Criminal possession of a firearm – a person is guilty of criminal possession of a firearm when he or she:

- (1) Possesses any firearm or; (2) lawfully possesses a firearm prior to the effective date of the chapter of the laws of two thousand thirteen which added this section subject to the registration requirements of subdivision sixteen-a of section 400.00 of this chapter and knowingly fails to register such firearm pursuant to such subdivision.

Criminal possession of a firearm is a class E felony.

then observed SALTER exit the driver side of the vehicle with a small cardboard box in hand. SALTER was then observed meeting with the CI. The CI and SALTER then returned towards the vehicle where SALTER reentered the driver side door. Law Enforcement personnel then observed SALTER operate the vehicle and drive away from the area. The CI was observed returning to the residence.

8. SA Nowak then met with the CI and retrieved the firearm sold by SALTER. Upon further observation SA Nowak recognized the cardboard box as the original packaging for a firearm. SA Nowak observed a label on the box that contained the make, caliber model, and serial number of a firearm. SA Nowak opened the cardboard box and observed a firearm. SA Nowak made the firearm clear and safe and observed that the label on the outside of the box matched with the firearm presented inside.

9. ATF records indicated that the firearm, purchased from SALTER, was originally purchased in July 2023, by a Jordan Lippert (identified as the sister of SALTER's girlfriend, Justus Ertell) of 128 Russell Blvd, Bradford, Pennsylvania. ATF records indicated that Lippert purchased two 9 mm firearms on July 19, 2023. A further review of ATF records indicated that on July 21, 2023, LIPPERT also purchased three firearms: a Glock 19, 9mm handgun SN/BSCG572, a Ruger SR9 9mm handgun SN/335-91567, and a Ruger SR9 SN/337-96483 from McKean County E Sales, a Federal Firearms Licensee located in Smethport, Pennsylvania.

10. On or about July 23, 2023, your affiant was notified that LIPPERT attempted to purchase an additional handgun from McKean County E Sales and that during the background

check the sale was delayed for a 15-day holding period.

11. On August 1, 2023, pursuant to a search warrant issued by Western District of Pennsylvania Chief United States Magistrate Judge Richard A. Lanzillo signed on July 26, 2023, law enforcement installed an electronic tracking device (ETD) on the 2020 Kia Soul, which was parked at 128 Russell Blvd., Bradford, Pennsylvania.

12. On August 1, 2023, information from the electronic tracking device indicated that the vehicle traveled to McKean County E Sales. Your affiant contacted McKean County E Sales shortly after the vehicle's arrival. McKean County E Sales indicated they had recently sold a starter pistol to a black male in a small SUV.

13. On August 2, 2023, agents observed the ETD on the vehicle traveling from Pennsylvania into the Buffalo, New York area. Law enforcement then conducted physical surveillance and observed the vehicle arrive at 1831 South Park Ave., Buffalo, NY. Law enforcement observed a group of males congregating in the driveway and rear yard of the 1831 South Park Ave Buffalo, NY. Some of these males were observed freely entering and exiting the door of 1831 South Park Ave., Buffalo, NY. A thin black male was seen removing a black plastic case from the 2020 Kia Soul utilized by SALTER and placing it into a black Ford SUV. Law enforcement knew this type of box to be similar or identical to a box commonly sold along with a Glock handgun. The 2020 Kia Soul was then observed departing the area with the males inside. Law enforcement maintained visual surveillance of the black Ford SUV, until the 2020 Kia Soul returned to 1831 South Park Ave., Buffalo, NY, sometime later.



14. A thin Black male was seen entering the Black Ford SUV. It was determined that this vehicle was bearing an expired registration not belonging to a Ford Vehicle. The Ford was observed departing the area where a traffic stop was then conducted by the Buffalo Police Department. The driver, Josue Gonzalez, was determined to be operating the vehicle without a driver's license, registration, or insurance. Ultimately an inventory search of the vehicle was performed and an empty Glock Handgun box with the serial number BSCG572 was located in the vehicle. A review of ATF records indicates that this Glock 19 9mm handgun was purchased by Jordan Lippert from McKean County E Sales on July 21, 2023, along with two other handguns.

15. On the morning of August 9, 2023, information from the electronic tracking device indicated that the 2020 Kia Soul being utilized by SALTER traveled to McKean County E Sales. Your affiant observed the vehicle traveling away from the area of McKean County E Sales towards the Bradford, Pennsylvania area. Your affiant contacted McKean County E Sales shortly after observing the vehicle traveling away from the shop. McKean County E Sales indicated that approximately ten minutes prior, Jordan Lippert and her fiancé came into the store to acquire firearms that had been previously paid for. McKean County E Sales stated that Lippert had been delayed for some time. Additionally, McKean County E Sales stated that soon after Lippert and her fiancé exited the store, Gino SALTER and his girlfriend entered the shop. McKean County E Sales stated SALTER perused the shop for a small amount of time and eventually purchased some firearms parts for an AR-15 style firearm. McKean County E Sales stated that all four individuals entered a red/orange Kia Soul and departed together. Lastly, McKean County E Sales stated the firearms transferred to LIPPERT were a Glock 43 and a Canik.

16. The 2020 Kia Soul was observed in the driveway of 128 Russell Blvd, Bradford, Pennsylvania. While maintaining physical surveillance, your affiant observed photos posted to SALTER's Facebook account (depicted below). These photos depicted SALTER possessing and handling firearms that resembled a Glock 43 and a Canik style firearm. These firearms were both observed in their respective cases as if they had just been purchased.

17. At approximately 1:15 pm the 2020 Kia Soul was observed by Troopers of the New York State Police traveling northbound on the US-219 within the town of Carrollton, NY. A felony traffic stop was initiated pursuant to a search warrant issued by Western District of New York United States Magistrate Judge Jeremiah J. McCarthy signed on August 7, 2023. Justus Ertell, the operator of the vehicle, and Gino PEACE SALTER, the passenger, were taken into custody. New York State Police initiated a search of the vehicle, and the following items were seized:

- a) One (1) Canik, 9mm, Pistol, model PT9, bearing serial number T6472-22CB40051.
- b) One (1) Canik firearm box containing one magazine and holster.
- c) One (1) Glock, 9mm, Pistol, model 43, bearing serial number BHYN178.
- d) One (1) Glock 43 firearm box bearing serial number BHYN178.
- e) One (1) .223 drum magazine, one (1) fore grip, one (1) bolt carrier group and charging handle.
- f) Forty-one (41) rounds of assorted ammunition inside of plastic baggie.
- g) Forty-nine (49) rounds of .380 ammunition.
- h) One (1) Crossman full auto BB gun.
- i) One (1) Commonwealth of Pennsylvania Certificate of Title for a 2010 Ford purchased by Gino SALTER.

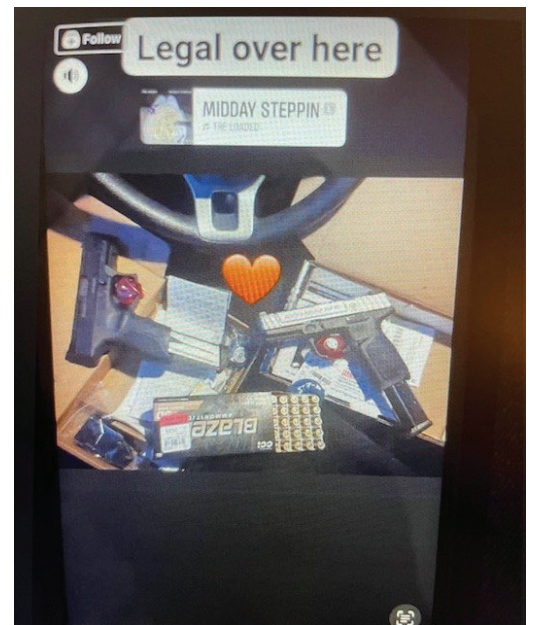
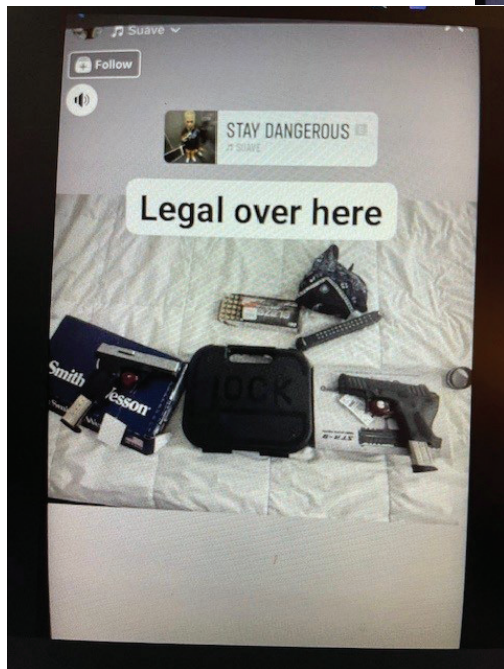
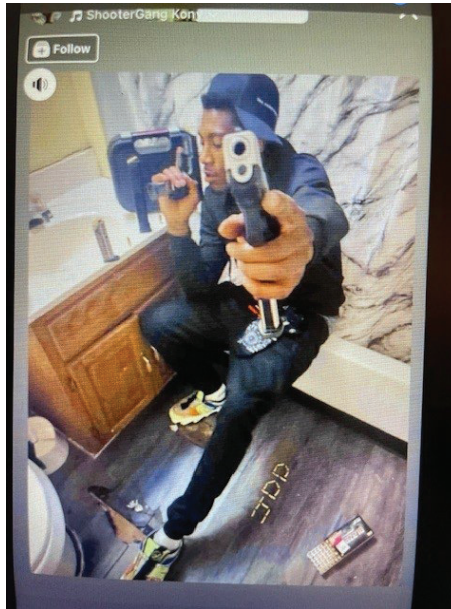
18. Your Affiant once again contacted McKean County E Sales and asked for the ATF 4473 form that Jordan LIPPERT would have completed in order for the firearms to be transferred to her. McKean County E Sales provided the form via email. Upon review of the ATF 4473 form, your affiant confirmed that the firearms seized inside of the 2020 Kia Soul pursuant to a Federal Search warrant matched the firearms that were just transferred to Jordan Lippert that same day.

19. On August 9, 2023, both SALTER and his girlfriend, Justus Ertell, were arrested. SALTER was charged with Criminal Possession of a Weapon, a Class E felony (New York State Penal Code Section 265.01-B) and Criminal Possession of a Weapon – Ammo Clip, a Class D felony (New York State Penal Code Section 265.02) in Cattaraugus County Court following the execution of the search warrant. SALTER, after being read his Miranda Rights, knowingly waived them, and provided a statement to law enforcement. In sum and substance, SALTER stated that there was one time that he purchased a firearm from Lippert and sold the firearm because he needed money. He continually denied selling any other firearms. However, later in the interview, he changed his story and told agents that he sold the firearm for Lippert because she was the one who needed money. SALTER claimed this transaction occurred in Bradford, PA.

20. Later that same day, Jordan Lippert was interviewed by law enforcement. Lippert admitted that she would go into gun stores with SALTER, and that he would point out to her which firearms he wanted her to purchase. She stated he would pay her a few hundred dollars to purchase the firearms for him. She stated she would typically transfer the firearms to him when back at her sister's residence in Bradford, PA. She explained that although she was

unsure what SALTER did with the firearms, she was 90% sure he sold them in Buffalo, NY. Lippert stated she purchased approximately seven firearms during three to four transactions.

21. In late July of 2023, SALTER posted multiple photos of firearms to his Facebook story. These photos were previously mentioned in paragraph 6.



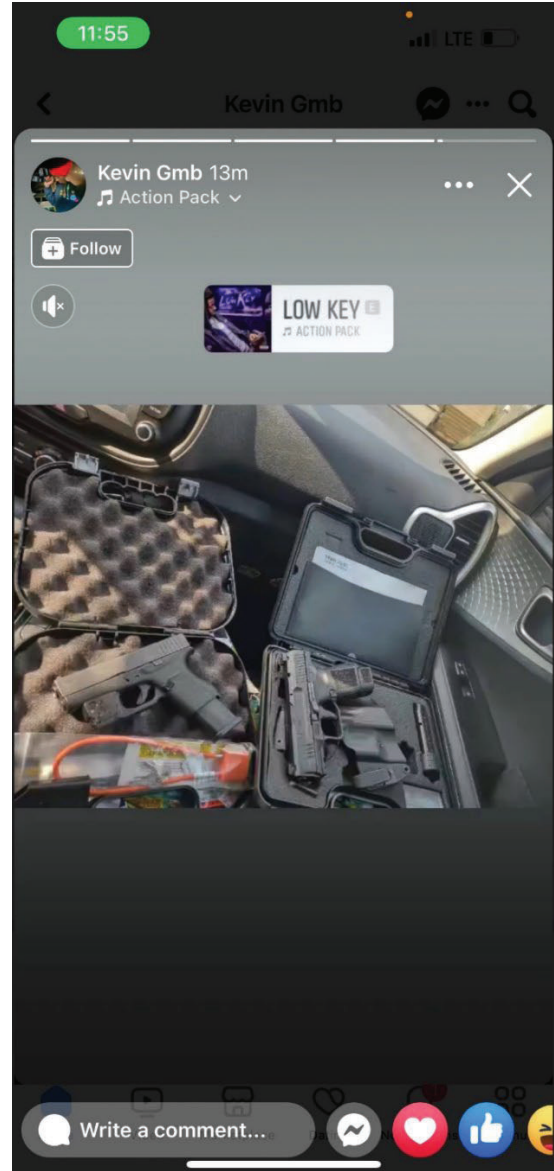
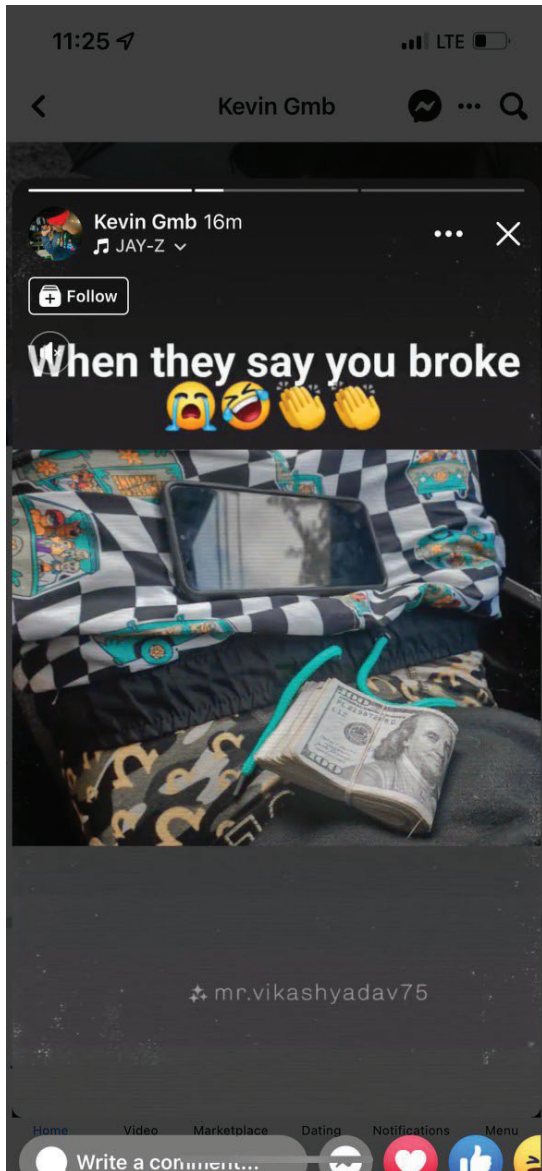
22. One of the firearms depicted on SALTER's Facebook page is the same firearm purchased from SALTER during the controlled purchase described in paragraph 7.

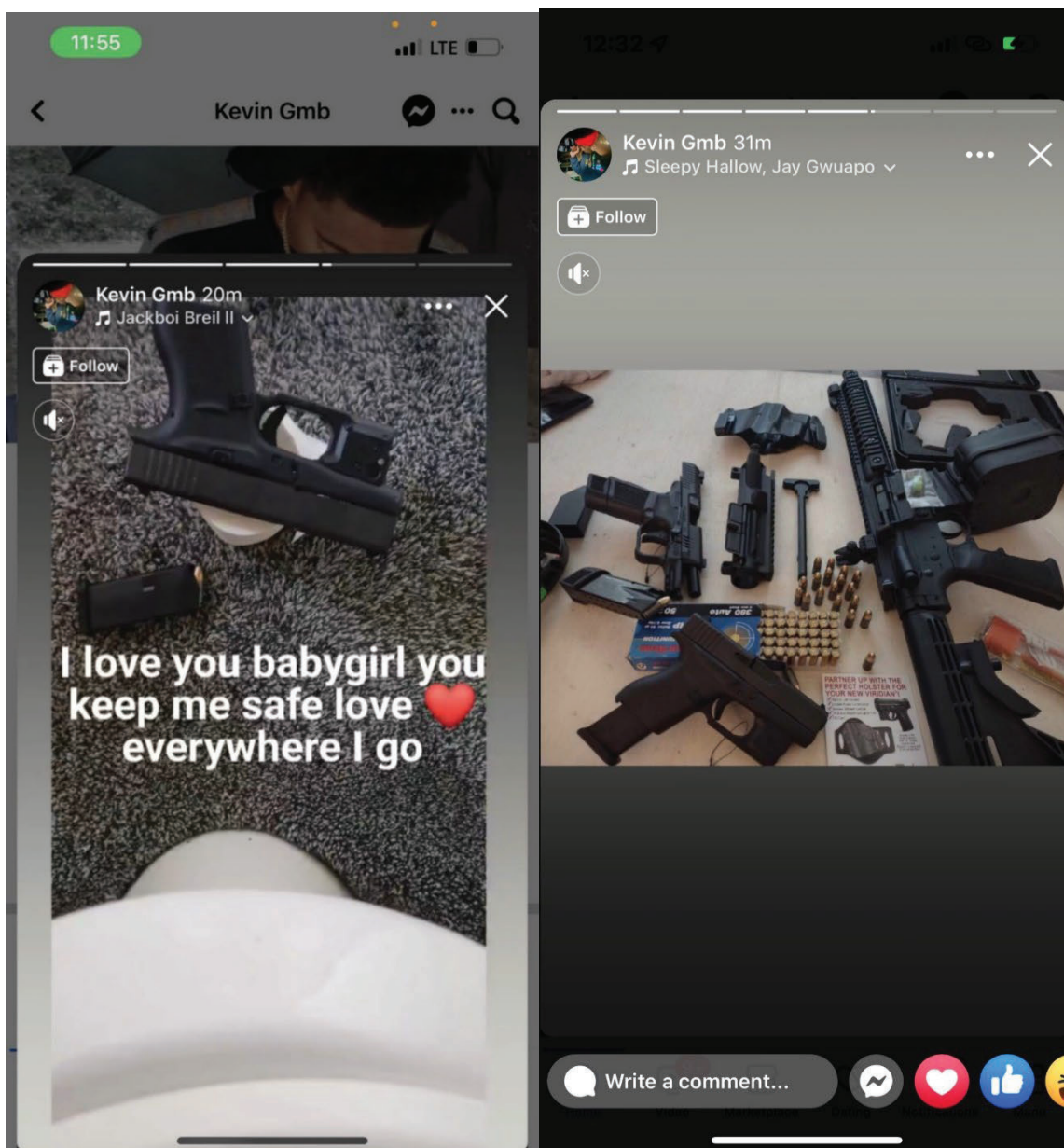
23. Additionally, sometime after the controlled purchase previously mentioned in paragraph 7, SALTER posted to Facebook utilizing the username Kevin Gmb additional photos and U.S. Currency.

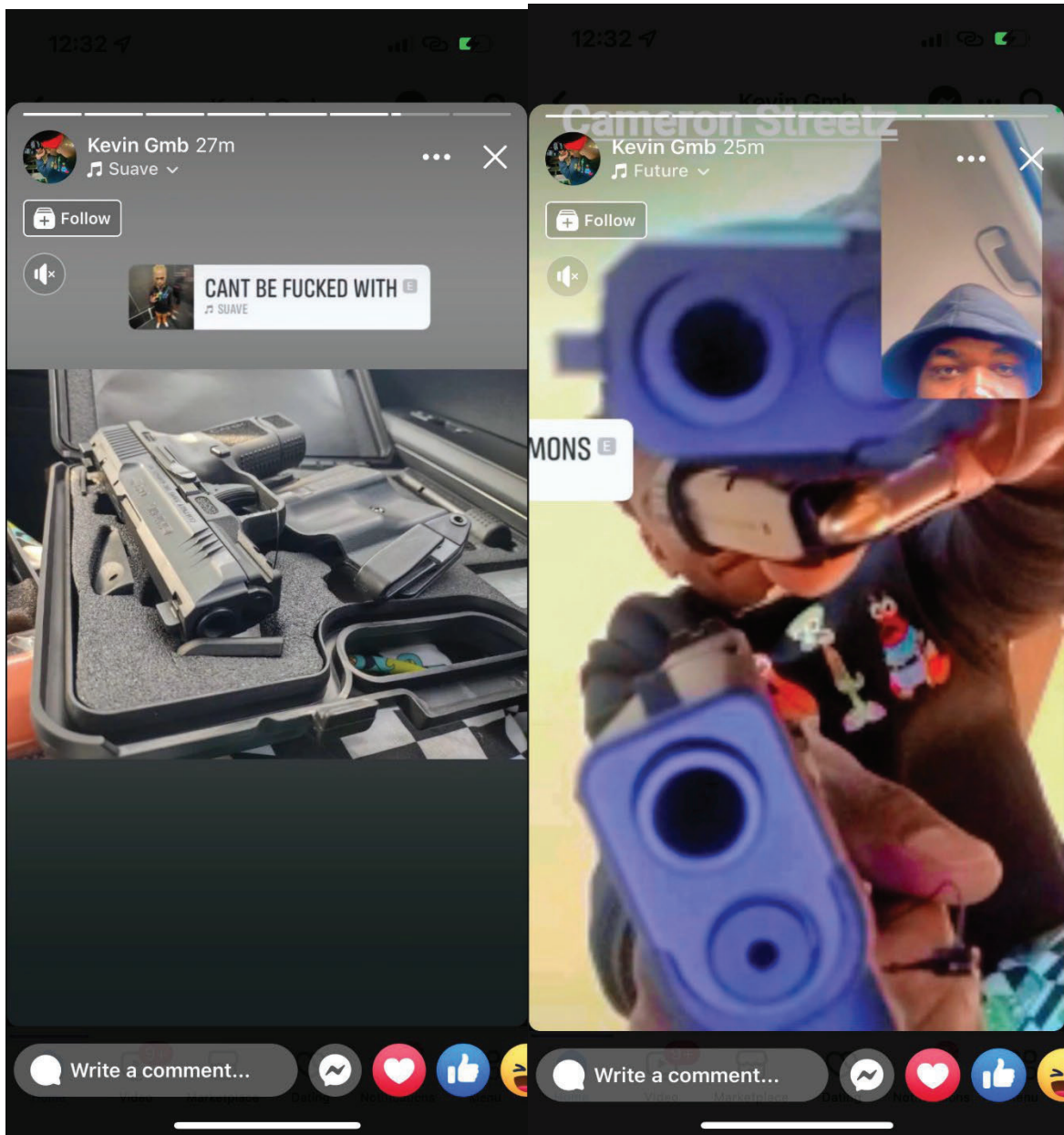




24. On August 9, 2023, your affiant observed the following photos posted that include the firearms previously mentioned in paragraph 16.



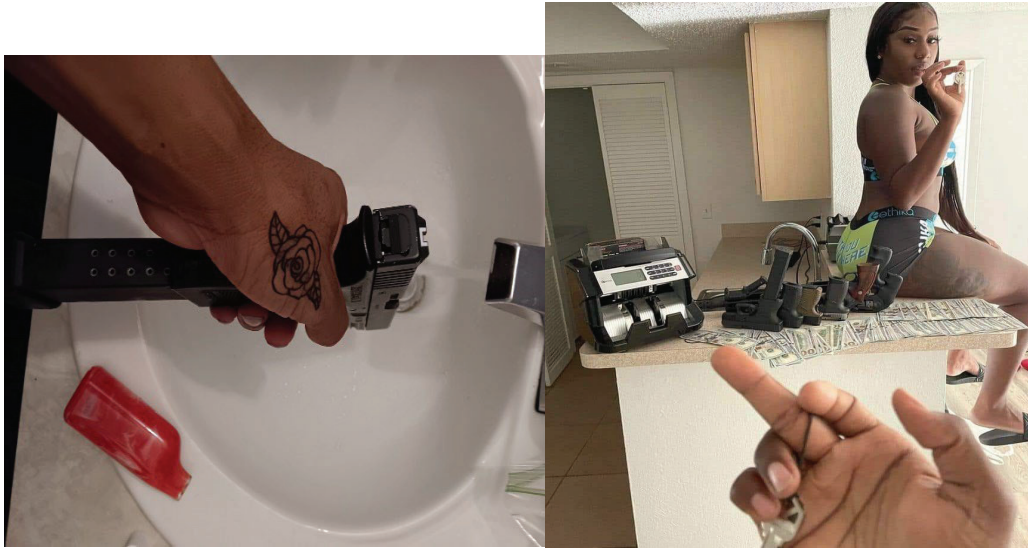




25. These photos depict large amounts of U.S. currency, multiple firearms, high-capacity magazines, as well as ammunition for firearms shown and unshown.

26. Most recently in early December of 2023 your affiant observed additional photos of U.S. currency and firearms posted to SALTER's Facebook page:





27. On December 27, 2023, Western District of New York United States Magistrate Judge Kenneth H. Schroeder Jr., signed a search and seizure warrant for the Facebook account “Kevin Gmb” known to be SALTER’S Facebook account. During this investigation, your Affiant has reviewed the Facebook account returns pursuant to the federal search and seizure warrant. Based on reviewed information, I believe the operator of the Facebook account, believed to be GINO SALTER, utilized Facebook and Facebook Messenger to conduct firearm related conversations and effectuate his firearms trafficking activities. Below are excerpts of communications involving Facebook Username: Kevin GMB (Gino SALTER) obtained pursuant to federal search and seizure warrants:

**Author** Kevin Gmb (Facebook: 100058514872468)

**Sent** 2023-12-01 16:25:17 UTC

**Body** Katie missed your call.

**Author** Katie Dorey (Facebook: 100000876211700)

**Sent** 2023-12-01 16:33:59 UTC

**Body** Cant talk

**Author** Kevin Gmb (Facebook: 100058514872468)

**Sent** 2023-12-01 19:19:41 UTC

**Body** Got the [glock](#) with the 30 clip if you know anyone wanna buy it lmk  
I'll chop you out

**Author** Katie Dorey (Facebook: 100000876211700)

**Sent** 2023-12-01 19:20:06 UTC

**Body** Ok

**Author** Kevin Gmb (Facebook: 100058514872468)

**Sent** 2023-12-04 21:07:16 UTC

**Body** Hi, is this available?

**Author** Ron Glizzy (Facebook: 100000939239013)

**Sent** 2023-12-04 23:24:00 UTC

**Body** Yes, are you interested?

**Author** Kevin Gmb (Facebook: 100058514872468)

**Sent** 2023-12-04 23:38:40 UTC

**Body** Yes

**Author** Ron Glizzy (Facebook: 100000939239013)

**Sent** 2023-12-07 03:14:18 UTC

**Body** \$700

**Author** Kevin Gmb (Facebook: 100058514872468)

**Sent** 2023-12-07 03:14:37 UTC

**Body** I'll give you a glock for it

**Author** Ron Glizzy (Facebook: 100000939239013)

**Sent** 2023-12-07 03:15:59 UTC

**Body** Bra you hot af

**Author** Kevin Gmb (Facebook: 100058514872468)

**Sent** 2023-12-07 03:16:48 UTC

**Body** Ima delet that go on my fb page though and go yo my photos ima send you my number

**Author** Kevin Gmb (Facebook: 100058514872468)

**Sent** 2023-12-07 03:17:00 UTC

**Body** 7164234765

**Author** Kevin Gmb (Facebook: 100058514872468)  
**Sent** 2023-12-04 21:26:56 UTC  
**Body** And I got this glock with the 31 round clip

**Author** Mark Kaney (Facebook: 100001547929090)  
**Sent** 2023-12-04 21:27:08 UTC  
**Body** Broooooo that thing is tight

**Author** Kevin Gmb (Facebook: 100058514872468)  
**Sent** 2023-12-04 21:27:23 UTC  
**Body** On God [REDACTED]

**Author** Mark Kaney (Facebook: 100001547929090)  
**Sent** 2023-12-04 21:27:30 UTC  
**Body** How much for that one

**Author** Kevin Gmb (Facebook: 100058514872468)  
**Sent** 2023-12-04 21:27:43 UTC  
**Body** 350

**Author** Kevin Gmb (Facebook: 100058514872468)  
**Sent** 2023-12-04 21:28:30 UTC  
**Body** It's not new if it was I would do more

**Author** Mark Kaney (Facebook: 100001547929090)  
**Sent** 2023-12-04 21:28:55 UTC  
**Body** Ahhh

**Author** Mark Kaney (Facebook: 100001547929090)  
**Sent** 2023-12-04 21:29:11 UTC  
**Body** I'll see what I got, I been tryna get myself something

**Author** Kevin Gmb (Facebook: 100058514872468)  
**Sent** 2023-06-26 17:57:11 UTC  
**Body** Help me sell ma glock I'll chop you out

**Author** Zach Lelonek (Facebook: 100090450626435)  
**Sent** 2023-06-26 17:57:32 UTC  
**Body** Bet how much

**Author** Kevin Gmb (Facebook: 100058514872468)  
**Sent** 2023-06-26 17:57:48 UTC  
**Body** 700 lowest 500 but say 700

**Author** Zach Lelonek (Facebook: 100090450626435)  
**Sent** 2023-06-26 17:57:58 UTC  
**Body** I got u

**Author** Kevin Gmb (Facebook: 100058514872468)  
**Sent** 2023-06-26 17:58:03 UTC  
**Body** Copy

**Author** Zach Lelonek (Facebook: 100090450626435)  
**Sent** 2023-06-26 17:58:15 UTC  
**Body** I'll lyk asap

**Author** Kevin Gmb (Facebook: 100058514872468)  
**Sent** 2023-06-26 17:58:21 UTC  
**Body** Copy

**Author** Zach Lelonek (Facebook: 100090450626435)  
**Sent** 2023-07-23 15:32:11 UTC  
**Body** Yo

**Author** Zach Lelonek (Facebook: 100090450626435)  
**Sent** 2023-07-23 15:32:33 UTC  
**Body** U stoll trying to get rid of tbt glock

**Author** Kevin Gmb (Facebook: 100058514872468)  
**Sent** 2023-07-23 15:46:02 UTC  
**Body** Ya I got more

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**Body**

Wya

**Author** Kevin Gmb (Facebook: 100058514872468)

**Sent** 2023-07-23 15:56:26 UTC

**Body** In Bradford

**Author** Zach Lelonek (Facebook: 100090450626435)

**Sent** 2023-07-23 15:56:33 UTC

**Body** Damn

**Author** Zach Lelonek (Facebook: 100090450626435)

**Sent** 2023-07-23 15:56:52 UTC

**Body** When u coming back to buff

**Author** Kevin Gmb (Facebook: 100058514872468)

**Sent** 2023-07-23 15:56:53 UTC

**Body** I'll be back tm

**Author** Zach Lelonek (Facebook: 100090450626435)

**Sent** 2023-07-23 15:56:58 UTC

**Body** Bet it

**Author** Zach Lelonek (Facebook: 100090450626435)

**Sent** 2023-07-23 15:57:01 UTC

**Body** How much

**Author** Zach Lelonek (Facebook: 100090450626435)

**Sent** 2023-07-23 15:57:58 UTC

**Body** U the the extended to ?

**Author** Zach Lelonek (Facebook: 100090450626435)

**Sent** 2023-07-23 15:58:18 UTC

**Body** I can give u 750 /800

**Author** Kevin Gmb (Facebook: 100058514872468)

**Sent** 2023-07-23 15:58:40 UTC

**Body** 800 bc it's new in the box with a dick on it

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**Author** PO Zelly (Facebook: 100064098724810)  
**Sent** 2023-10-10 12:20:39 UTC  
**Body** This shi goes about 55

**Author** Kevin Gmb (Facebook: 100058514872468)  
**Sent** 2023-10-10 15:52:55 UTC  
**Body** Wym

**Author** Kevin Gmb (Facebook: 100058514872468)  
**Sent** 2023-10-10 15:54:02 UTC  
**Body** Lmk I'll grab it today

**Author** Kevin Gmb (Facebook: 100058514872468)  
**Sent** 2023-10-10 15:54:16 UTC  
**Body** As long as it's valid

**Author** PO Zelly (Facebook: 100064098724810)  
**Sent** 2023-10-10 16:13:34 UTC  
**Body** How much you want it for?

**Author** PO Zelly (Facebook: 100064098724810)  
**Sent** 2023-10-10 16:14:14 UTC  
**Body** I'm selling this for 850 when you click my profile you gon see the bike is up for \$850

**Author** Kevin Gmb (Facebook: 100058514872468)  
**Sent** 2023-10-10 16:15:35 UTC  
**Body** Send me yo address if it run good I'll buy it give you \$650 and the glock

**Author** PO Zelly (Facebook: 100064098724810)  
**Sent** 2023-10-10 16:20:26 UTC  
**Body** Alr can you give me dat Glock loaded?

**Author** PO Zelly (Facebook: 100064098724810)  
**Sent** 2023-10-10 16:20:46 UTC  
**Body** Don't got bullet

## Meta Platforms Business Record

Page 10129

**Sent**  
 2023-08-09 14:09:16 UTC  
**Body** Imma spin back den

**Author** Cameron Streetz (Facebook: 100087580047234)  
**Sent** 2023-08-09 14:09:23 UTC  
**Body** Hold that Glock for me

**Author** Kevin Gmb (Facebook: 100058514872468)  
**Sent** 2023-08-09 14:09:27 UTC  
**Body** You could take that 150 and come out here pay my peoples 50 and buy a gun

**Author** Kevin Gmb (Facebook: 100058514872468)  
**Sent** 2023-08-09 14:09:44 UTC  
**Body** They always gonna be around brother

**Author** Cameron Streetz (Facebook: 100087580047234)  
**Sent** 2023-08-09 14:09:56 UTC  
**Body** Bet brother imma hit u Friday

**Author** Kevin Gmb (Facebook: 100058514872468)  
**Sent** 2023-08-09 14:15:39 UTC  
**Body** You sent 8 photos.

**Attachments** image-963420814869334 (963420814869334)

**Type** image/jpeg  
**Size** 53045

**Author** Kevin Gmb (Facebook: 100058514872468)  
**Sent** 2023-06-10 22:51:15 UTC  
**Body** Lock me in on YouTube to

**Author** Curry Umbre (Facebook: 100062151454662)  
**Sent** 2023-06-10 22:51:27 UTC  
**Body** I gotchu my boy

**Author** Curry Umbre (Facebook: 100062151454662)  
**Sent** 2023-06-10 22:51:39 UTC  
**Body** U got a glock?

**Author** Kevin Gmb (Facebook: 100058514872468)  
**Sent** 2023-06-10 22:52:02 UTC  
**Body** GI but lmk ..naw had one I just sold for 1000

**Author** Curry Umbre (Facebook: 100062151454662)  
**Sent** 2023-06-10 22:52:10 UTC  
**Body** L

**Author** Curry Umbre (Facebook: 100062151454662)  
**Sent** 2023-06-10 22:52:12 UTC  
**Body** Oh

**Author** Kevin Gmb (Facebook: 100058514872468)  
**Sent** 2023-06-10 22:52:19 UTC  
**Body** You sent a photo.

**Attachments** image-1867007857033506 (1867007857033506)

28. Based on my training and experience, and information learned during the investigation, your Affiant believes these photos and messages are firearms trafficking related. Your Affiant has learned from training and expertise, as well as from past investigations, that firearm traffickers frequently use forms of social media to present firearms and communicate back and forth to initiate transactions. Your Affiant is aware that firearms distributors attempt to conceal some or all of their conversations to conceal their illegal activity.

29. In July of 2023, a member of the ATF Buffalo field office conducted a record check within ATF records, and it was determined that Gino SALTER has never applied for or received a Federal Firearms License. Additionally, in August of 2023, your affiant requested a national firearm Registration and Transfer Record for Gino P. SALTER. It was determined that no records were found.

30. Based on your Affiant's training and experience, information learned during the investigation, and conversations with other law enforcement personnel, your Affiant believes that SALTER is unlawfully dealing firearms in the Buffalo, NY, area. Moreover, GINO SALTER's firearms trafficking activities have impacted interstate commerce. Based on the information learned during the investigation, it appears that GINO SALTER has utilized another individual (Jordan Lippert), a resident of Pennsylvania, to purchase firearms for him to sell in the Buffalo, NY, area. Additionally, SALTER was arrested in the state of New York with two firearms purchased by Lippert in the state of Pennsylvania.

### CONCLUSION

31. WHEREFORE, based on the foregoing, your Affiant respectfully submits that probable cause exists to believe that GINO SALTER violated Title 18, United States Code, Sections 922(a)(1)(A) (unlicensed dealing) and 924(b) (interstate shipment and transportation of firearms), and requests that a Criminal Complaint and Arrest Warrant as aforesaid is issued, and that this Complaint and Affidavit to be sealed based on a continuing investigation and further Order of this Court.

**JOHN  
NOWAK**

JOHN NOWAK  
Special Agent  
Bureau of Alcohol, Tobacco, Firearms, &  
Explosives

Digitally signed by  
JOHN NOWAK  
Date: 2024.03.11  
13:37:36 -04'00'

Affidavit submitted electronically by e-mail in .pdf format. Oath administered, and contents and signatures attested to me as true and accurate telephonically pursuant to Fed R. Crim. P. 4.1, this 12th day of March, 2024




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HONORABLE JEREMIAH J. MCCARTHY  
United States Magistrate Judge